

EXHIBIT

24

Transcript of the Testimony of

JENNIFER TUSCANO

July 3, 2025

**STUDENTS FOR JUSTICE IN PALESTINE AT PITT VS
UNIVERSITY OF PITTSBURGH**



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| 1 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA CIVIL ACTION NO. 2:25-CV-00524 STUDENTS FOR JUSTICE IN PALESTINE AT PITT,) Plaintiff,) VS.) UNIVERSITY OF PITTSBURGH; JOAN GABEL, MARLIN NABORS, KARIN ASHER, DaVAUGHN VINCENT-BRYAN, MATTHEW LANDY, and JAMEY MENTZER, all in their official and individual capacities,) Defendants.) DEPOSITION OF JENNIFER TUSCANO VIA VIDEOCONFERENCE DEPOSITION taken before me, Mary J. Carney, a Notary Public within and for the Commonwealth of Pennsylvania, via Zoom videoconference, beginning at 12:03 p.m. on July 3, 2025, pursuant to Notice and to be used pursuant to the Federal Rules of Civil Procedure in the aforesaid cause of action, pending in the United States District Court for the Western District of Pennsylvania. | 2 APPEARANCES On Behalf of Plaintiff: Solomon Furious Worlds, Esquire Kirsten M. Hanlon, Esquire ACLU OF PENNSYLVANIA P.O. Box 60173 Philadelphia, PA 19102 215-592-1513 sfworlds@aclupa.org khanlon@aclupa.org Witold J. Walczak, Esquire ACLU OF PENNSYLVANIA P.O. Box 23058 Pittsburgh, PA 15222 412-681-7864 vwalczak@aclupa.org On Behalf of Defendants: Alexander R. Bilus, Esquire Mary Hutchings, Esquire SAUL EWING LLP Centre Square West 1500 Market Street, 38th Floor Philadelphia, PA 19102-2186 215-972-7777 alexander.bilus@saul.com mary.hutchings@saul.com Also Present: J. Nicole Rhodes, Esquire University of Pittsburgh Emily Hoecker, Paralegal ACLU of Pennsylvania 3 INDEX EXAMINATION BY MX. WORLDS - PAGE 4 TUSCANO EXHIBITS INTRODUCED: 1 - PAGE 17 2 - PAGE 32 3 - PAGE 34 4 - PAGE 51 5 - PAGE 51 6 - PAGE 57 7 - PAGE 73 15 16 17 18 19 20 21 22 23 24 25 |
| | 4 WHEREUPON, JENNIFER TUSCANO, of lawful age, being by me first duly sworn to testify the truth, the whole truth, and nothing but the truth, as hereinafter certified, deposes and says as follows: EXAMINATION: BY MX. WORLDS Q. Hello, Ms. Tuscano. Just before we really get into things, I'll just do an introduction. My name is Solomon Furious Worlds, they/them pronouns. I'm an attorney here at the ACLU of Pennsylvania. I'm an attorney specifically representing Students for Justice in Palestine at Pitt in the lawsuit against the University of Pennsylvania. Are you familiar with the lawsuit that's going on between them? A. I am. Q. Okay, excellent. Have you ever been deposed before? A. I have. Q. Okay. How many times? A. One. Q. What was the occasion? |

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| <p>1 A. Termination of an employee.</p> <p>2 Q. That doesn't sound like it was a</p> <p>3 fun occasion.</p> <p>4 A. It was not.</p> <p>5 Q. Well, I'm going to go through the</p> <p>6 ground rules again. You may have heard</p> <p>7 these before, especially if you've been</p> <p>8 through a deposition, but I think this</p> <p>9 would be helpful.</p> <p>10 MX. WORLDS: Before I go through</p> <p>11 those ground rules, actually, Sandy, just</p> <p>12 to be sure, did you want to stipulate again</p> <p>13 to the same?</p> <p>14 MR. BILUS: Yeah, we would like</p> <p>15 to read and sign, and we can stipulate that</p> <p>16 all objections are reserved except for as</p> <p>17 to form, just like last time. Thank you.</p> <p>18 MX. WORLDS: Yeah, of course.</p> <p>19 Just wanted to get that done.</p> <p>20 Q. (BY MX. WORLDS) So some ground</p> <p>21 rules, only one person should speak at a</p> <p>22 time. We'll do our best, everyone, we'll</p> <p>23 all do our best to maintain that rule. All</p> <p>24 answers must be verbal. And you should ask</p> <p>25 for clarification if you don't understand a</p> | <p>5</p> <p>1 question I ask you. If you answer, I'll</p> <p>2 just assume that you understand, but always</p> <p>3 feel free to ask for clarification. And to</p> <p>4 that end, if you later realize that you</p> <p>5 misspoke or maybe you remember something</p> <p>6 new or that you misremembered before,</p> <p>7 always feel free to correct it. It's</p> <p>8 always better to correct it here and now</p> <p>9 versus needing to correct it later.</p> <p>10 Sandy, your attorney, is present. I know</p> <p>11 Nikki is also present. I'm not sure</p> <p>12 exactly Mary's role, but she said Sandy's</p> <p>13 name, so I assume she's also part of the</p> <p>14 team there. You can request a break at any</p> <p>15 time except for when I have already asked a</p> <p>16 question and am waiting for an answer. And</p> <p>17 you must answer all questions truthfully</p> <p>18 and to the best of your ability.</p> <p>19 Do you understand all those rules as I've</p> <p>20 laid them out?</p> <p>21 A. I do.</p> <p>22 Q. Excellent. And are you taking any</p> <p>23 medications or on any substances or have</p> <p>24 any sort of conditions that may prevent you</p> <p>25 from answering truthfully today?</p> |
| <p>1 A. No.</p> <p>2 Q. Okay, excellent. And I believe you</p> <p>3 said you're at home?</p> <p>4 A. I am.</p> <p>5 Q. With a struggling AC system?</p> <p>6 A. Clarify, with no AC system.</p> <p>7 Q. I'm sorry, okay. Excuse me, excuse</p> <p>8 me. I wouldn't want to oversell it. Well,</p> <p>9 if you need a break for water or ice or</p> <p>10 just a cold rag, please let us know. All</p> <p>11 right. Is anyone else in the room with</p> <p>12 you?</p> <p>13 A. No.</p> <p>14 Q. No, okay. And then do you have</p> <p>15 your cell phone near you?</p> <p>16 A. I do.</p> <p>17 Q. Would it be possible for you to</p> <p>18 just kind of move it a little bit away from</p> <p>19 you?</p> <p>20 A. Sure.</p> <p>21 Q. Of course if an emergency comes up</p> <p>22 --</p> <p>23 A. Yep.</p> <p>24 Q. Thanks. And do you have any other</p> <p>25 computers, laptops, tablets around you,</p> | <p>7</p> <p>1 other communication devices like that?</p> <p>2 A. No.</p> <p>3 Q. No, okay. Let's begin then. So</p> <p>4 did you do anything to prepare for this</p> <p>5 deposition?</p> <p>6 A. No.</p> <p>7 Q. I saw you move closer to the</p> <p>8 screen. Are you having trouble hearing me</p> <p>9 at all?</p> <p>10 A. I did on that one, Solomon, yeah.</p> <p>11 Q. Okay, let me -- give me one second</p> <p>12 to make sure I'm not muting myself and</p> <p>13 using the correct microphone. Is this</p> <p>14 better?</p> <p>15 A. No.</p> <p>16 Q. Is it worse?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Then I'll speak up a little</p> <p>19 bit and move a little closer to my laptop.</p> <p>20 A. Okay.</p> <p>21 Q. I'll ask that question again. I'm</p> <p>22 sorry, I got a little distracted. Did you</p> <p>23 do anything to prepare for this deposition?</p> <p>24 A. Only my meeting with Sandy and the</p> <p>25 team yesterday.</p> |

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| <p>1 Q. And when you say the team, do you 2 mean the legal team? 3 A. Correct. 4 Q. And about how long was that 5 meeting? 6 A. An hour and a half. 7 Q. Hour and a half, okay. During that 8 meeting -- and now I'm going to be very 9 careful here the way I phrase this question 10 because I don't want to get into any 11 privileged information -- but during that 12 meeting did counsel go into great detail as 13 to how you are to answer questions? 14 A. No. 15 MX. WORLDS: Sandy, I see your 16 face, yeah. 17 MR. BILUS: Yeah, let's try and 18 stay away from content. 19 MX. WORLDS: I'll try, yeah. 20 MR. BILUS: I'll note an 21 objection there, but, you know, she's 22 already answered. But, yeah, go ahead. 23 MX. WORLDS: Absolutely. I 24 wasn't going to probe too deep there. I 25 wasn't trying to get too much of the</p> | <p>9 1 content either. 2 MR. BILUS: Okay. 3 Q. (BY MX. WORLDS) Okay. Ms. 4 Tuscano, would you prefer that I refer to 5 you as Ms. Tuscano, Jen, Jenny from the 6 Block, I'm not sure what's -- 7 A. Jen is good. 8 Q. Jen is good, excellent. Could you 9 tell me a little bit about your higher 10 education, kind of post high school, 11 specifically what schools you went to and 12 the like? 13 A. I attended the University of 14 Pittsburgh at Johnstown, obtained my 15 undergraduate degree, and then attended the 16 Indiana University of Pennsylvania to 17 obtain a Master's degree. 18 Q. And what is your current role at 19 Pitt? 20 A. I am the Executive Associate 21 Athletic Director and Senior Women's 22 Administrator. 23 Q. Is that the highest position you've 24 held within the Pitt administration? 25 A. No.</p> |
| <p>1 Q. No. What other positions kind of 2 in that realm, Pitt administration, have 3 you held? 4 A. I served as the Interim Athletic 5 Director in the fall. 6 Q. In any of -- have you ever, excuse 7 me, have you served in any other kind of 8 administrative roles within the University? 9 A. No. 10 Q. I'd say kind of like at the Dean 11 level or higher? Just those two? 12 A. Correct, yep. 13 Q. During your time as the Interim 14 Athletic Director or during your time now 15 in your current role in the upper 16 administration, could you tell me a little 17 bit about your job responsibilities? 18 A. Actively work with members of our 19 Athletic Department to provide resources 20 and opportunities for student athletes and 21 coaches. 22 Q. Is that specific to the Athletics 23 Department; it doesn't go any further than 24 that? 25 A. Correct.</p> | <p>11 1 Q. All right. Is there a disciplinary 2 process within the Athletics Department 3 specifically? 4 A. Can you clarify? 5 Q. Absolutely. I know from my own 6 personal experience in working with 7 students across the Commonwealth that at 8 some schools there will be a disciplinary 9 process for the School of Law and then the 10 College of Liberal Arts and then the 11 Engineering School. Sometimes they'll have 12 different disciplinary processes. I'm not 13 sure if that's the case at Pitt. Does the 14 Athletics Department perhaps have its own 15 separate from the main campus disciplinary 16 process? 17 A. Our student athletes participate in 18 the general student conduct process for any 19 violations that may or may not occur on 20 campus. 21 Q. That makes sense. And of course 22 athletics isn't a school in the same way as 23 a College of Engineering, and so that 24 tracks. What is your general experience 25 with the disciplinary processes at Pitt?</p> |

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| <p>1 Student disciplinary processes, excuse me?</p> <p>2 A. I've served on the Level II Student</p> <p>3 Conduct Hearing Board for about 18 months.</p> <p>4 Q. Eighteen, okay, 18 months. So when</p> <p>5 you say you've served on the board for</p> <p>6 about 18 months, to me, what I'm hearing is</p> <p>7 like there's a general body perhaps that</p> <p>8 maybe sits and it sounds like you sit for a</p> <p>9 term; is that correct?</p> <p>10 A. Yeah, I -- there's no defined term</p> <p>11 to my knowledge, Solomon.</p> <p>12 Q. Okay. Could you tell me about how</p> <p>13 you got on the board?</p> <p>14 A. I was approached by Matt Landy and</p> <p>15 asked if I'd be willing to serve on the</p> <p>16 board.</p> <p>17 Q. Did Landy tell you why you were</p> <p>18 approached?</p> <p>19 A. Not that I remember.</p> <p>20 Q. Not that, I'm not thinking there's</p> <p>21 any conspiracy or anything; it just, it</p> <p>22 sounds like a secret society, you get</p> <p>23 tapped and then you get approached. I</p> <p>24 think there's something kind of cool about</p> <p>25 that. Is it just part of, because of your</p> | <p>13</p> <p>1 role in Athletics, or is it because of how</p> <p>2 long you've been at Pitt; do you have any</p> <p>3 reason why?</p> <p>4 A. I don't have any reason why.</p> <p>5 Q. Okay, cool. Is this the first time</p> <p>6 then that you've been on an 18-month stint</p> <p>7 with the board?</p> <p>8 A. Correct.</p> <p>9 Q. And you said there aren't set</p> <p>10 terms, which makes me think that your stint</p> <p>11 on the disciplinary board is maybe done?</p> <p>12 A. No, I'm still an active member.</p> <p>13 Q. You're still an active member,</p> <p>14 okay.</p> <p>15 A. Yep.</p> <p>16 Q. It's just been 18 months since you</p> <p>17 started?</p> <p>18 A. Sure, yep.</p> <p>19 Q. Got it, thank you.</p> <p>20 A. Correct.</p> <p>21 Q. How familiar are you then with</p> <p>22 student conduct in disciplinary matters?</p> <p>23 A. I would say somewhat familiar.</p> <p>24 Q. This is the first kind of time</p> <p>25 you've been -- you've served in this</p> |
| <p>1 capacity?</p> <p>2 A. Yes.</p> <p>3 Q. How many disciplinary boards have</p> <p>4 you been on?</p> <p>5 A. I don't know the exact number.</p> <p>6 Q. Could you give me an estimate?</p> <p>7 A. Less than five.</p> <p>8 Q. Okay, less than five, okay. Okay.</p> <p>9 More than three?</p> <p>10 A. I don't believe.</p> <p>11 Q. So it sounds like even though</p> <p>12 you've been on the board for 18 months, you</p> <p>13 haven't been called on to kind of, to</p> <p>14 active duty, if you will, many times?</p> <p>15 A. Correct.</p> <p>16 Q. Less than three times you've been</p> <p>17 called up to be on what I, if I'm</p> <p>18 understanding the verbiage correctly, an</p> <p>19 individual panel for a specific</p> <p>20 disciplinary instance?</p> <p>21 A. Correct.</p> <p>22 Q. So there's a larger board, but then</p> <p>23 individual panelists will sit on individual</p> <p>24 disciplinary matters?</p> <p>25 A. Correct.</p> | <p>15</p> <p>1 Q. Okay. Do you know how many people</p> <p>2 are on the larger board?</p> <p>3 A. I don't know.</p> <p>4 Q. You said you've served on</p> <p>5 disciplinary panels less than three times,</p> <p>6 so either two or one. Do you -- were both</p> <p>7 instances regarding student organizations</p> <p>8 or individuals?</p> <p>9 A. I don't remember both of them. One</p> <p>10 of them was regarding individuals and was</p> <p>11 not a student organization.</p> <p>12 Q. Without revealing any, you know,</p> <p>13 personal identifying information with</p> <p>14 regards to that situation, could you tell</p> <p>15 me a little bit about the disciplinary</p> <p>16 conduct I guess alleged? Not necessarily</p> <p>17 the facts related to it, but merely the,</p> <p>18 maybe the charges -- excuse me, there we go</p> <p>19 -- can you tell me about the charges that</p> <p>20 were brought against that individual?</p> <p>21 A. I don't remember the charges.</p> <p>22 Q. Okay, thank you. One last</p> <p>23 question. Members of this board who then</p> <p>24 go on individual panels, do they serve for</p> <p>25 disciplinary and academic infractions, or</p> |

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| <p>1 only disciplinary?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. I said that was the last</p> <p>4 question of the board. I'm going to stop</p> <p>5 saying last question because I think I'll</p> <p>6 just keep lying to you. Is there any</p> <p>7 hierarchy on that board?</p> <p>8 A. Not to my knowledge.</p> <p>9 Q. Not to your knowledge, okay. All</p> <p>10 right.</p> <p>11 Kirsten, could you please bring up the</p> <p>12 first document, the email to Jennifer from</p> <p>13 Landy?</p> <p>14 Mary, I am -- could you please mark this</p> <p>15 document once we bring it up. And, Sandy,</p> <p>16 just so you know, this is</p> <p>17 UPITT 1777.</p> <p>18 MR. BILUS: Thank you.</p> <p>19 MS. HANLON: Can you see the</p> <p>20 screen? Oh. Now can you see the screen?</p> <p>21 MX. WORLDS: Now it's coming up,</p> <p>22 yeah.</p> <p>23 MS. HANLON: And, Sandy, can you</p> <p>24 see the file in the Dropbox, too?</p> <p>25 MR. BILUS: I'm checking. Yes,</p> | <p>17</p> <p>1 thank you.</p> <p>2 Q. (BY MX. WORLDS) Jen, are you able</p> <p>3 to read this document or would you like us</p> <p>4 to maybe zoom in some?</p> <p>5 A. I can read it.</p> <p>6 Q. Okay. Wonderful eyes, good. Do</p> <p>7 you recognize this document?</p> <p>8 A. I do.</p> <p>9 Q. Could you describe what it is?</p> <p>10 A. An email from Matt Landy confirming</p> <p>11 training, and then if I had any previous</p> <p>12 involvement with the SJP student</p> <p>13 organization.</p> <p>14 Q. Excellent. And am I to understand</p> <p>15 from the content of this email that you had</p> <p>16 no prior involvement with SJP?</p> <p>17 A. Yes, that's correct.</p> <p>18 Q. And that would, excuse me, and that</p> <p>19 would be involvement prior to the February</p> <p>20 4 disciplinary hearing; correct?</p> <p>21 A. Correct.</p> <p>22 Q. Yeah, because this email is dated</p> <p>23 February 2. The training that Mr. Landy is</p> <p>24 referring to, what is that training?</p> <p>25 A. Implicit bias training.</p> |
| <p>19</p> <p>1 Q. Implicit bias training. Okay, is</p> <p>2 that standard for all faculty members or is</p> <p>3 that, was that related to the Conduct</p> <p>4 Board?</p> <p>5 A. I don't know.</p> <p>6 Q. You don't know. When did you take</p> <p>7 this implicit bias training?</p> <p>8 A. I don't remember. We -- it's</p> <p>9 annual, an annual training for athletics,</p> <p>10 but I don't remember --</p> <p>11 Q. I see.</p> <p>12 A. -- the date.</p> <p>13 Q. Thank you.</p> <p>14 And, Mary, I'm sorry, I keep speaking.</p> <p>15 My</p> <p>16 active listening skills are biting me in</p> <p>17 the butt right now. I will do my best to</p> <p>18 not talk at the same time as Jen.</p> <p>19 And thank you for that clarification,</p> <p>20 Jen.</p> <p>21 So this training was about implicit bias,</p> <p>22 not about any sort of specific training</p> <p>23 pursuant to being on the Conduct Board?</p> <p>24 A. Correct.</p> <p>25 Q. Did you get any training when you</p> | <p>20</p> <p>joined the Conduct Board?</p> <p>2 A. I did.</p> <p>3 Q. You did. What was that training</p> <p>4 like?</p> <p>5 A. Matt Landy reviewed policies and</p> <p>6 procedures as a member of the board,</p> <p>7 Hearing Board.</p> <p>8 Q. Which policies and procedures?</p> <p>9 There's lot of policies and procedures.</p> <p>10 A. I don't remember.</p> <p>11 Q. Yeah, that's -- there's a lot of</p> <p>12 policies and procedures. Was it perhaps</p> <p>13 the Student Code of Conduct, or was that</p> <p>14 included?</p> <p>15 A. I don't remember.</p> <p>16 Q. You don't remember. Do you</p> <p>17 remember how the University -- excuse me --</p> <p>18 how Landy represented that the University</p> <p>19 interprets its code?</p> <p>20 A. Can you clarify?</p> <p>21 Q. Yes, I can. I'm guessing that part</p> <p>22 of what was described in this training was</p> <p>23 the Student Code of Conduct because that</p> <p>24 seems to be the main code with regards to</p> <p>25 disciplinary matters. You'd agree it's the</p> |

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| <p>1 main code; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Yeah, it's got the policy and the</p> <p>4 procedure in there. It has the various</p> <p>5 substantive rules that students must</p> <p>6 follow, if that makes sense. I'm curious to</p> <p>7 know if Landy described how the school goes</p> <p>8 about charging students for alleged</p> <p>9 infractions?</p> <p>10 A. I don't remember.</p> <p>11 Q. You don't remember. Do you know if</p> <p>12 Landy talked about the charging process at</p> <p>13 all?</p> <p>14 A. I don't remember, I'm sorry,</p> <p>15 Solomon.</p> <p>16 Q. No, that's okay. And feel -- do</p> <p>17 not worry. Feel free to keep saying you</p> <p>18 don't remember. I'm going to probably ask</p> <p>19 you some other questions, too, to be frank,</p> <p>20 I wouldn't remember either. I totally get</p> <p>21 it.</p> <p>22 In regards to the training, we both</p> <p>23 assume, without actually knowing, that the</p> <p>24 Code of Conduct was likely involved given</p> <p>25 the topic. Do you think that -- excuse me,</p> | <p>21</p> <p>1 not do you think -- do you recall if anyone</p> <p>2 at any point talked about differences in</p> <p>3 how the code is interpreted for individuals</p> <p>4 versus student organizations?</p> <p>5 A. No, I don't remember.</p> <p>6 Q. Okay. Let's talk more specifically</p> <p>7 about SJP Pitt's February 4 disciplinary</p> <p>8 hearing.</p> <p>9 Kirsten, we can take this down now. Thank</p> <p>10 you. So when I say SJP, do you know who I'm</p> <p>11 talking about?</p> <p>12 A. I do.</p> <p>13 Q. Excellent. So for purposes of the</p> <p>14 rest of today, we, I can say SJP and that</p> <p>15 means Students for Justice in Palestine at</p> <p>16 Pitt?</p> <p>17 A. Yes.</p> <p>18 Q. Excellent, thank you. You are</p> <p>19 familiar with the February 4 disciplinary</p> <p>20 proceedings, I assume?</p> <p>21 A. Yes.</p> <p>22 Q. Excellent. How were you selected</p> <p>23 for that particular panel?</p> <p>24 A. I don't know. I provided my</p> <p>25 availability.</p> |
| <p>1 Q. I see. So it seems like selection</p> <p>2 for individual panels is based largely on</p> <p>3 availability of the board members?</p> <p>4 A. I don't know.</p> <p>5 Q. You think? Yeah, you don't know?</p> <p>6 A. Right.</p> <p>7 Q. You don't know. That's fair,</p> <p>8 that's fair.</p> <p>9 A. Yep.</p> <p>10 Q. Before you were on the panel, you</p> <p>11 said that you had undergone implicit bias</p> <p>12 training, per the last email we saw?</p> <p>13 A. Yes, correct.</p> <p>14 Q. Did they ask you questions about</p> <p>15 any biases you may have with regards to the</p> <p>16 student organization before you served on</p> <p>17 this individual panel?</p> <p>18 A. Yes.</p> <p>19 Q. Did they ask you those same kind of</p> <p>20 bias questions before you served on the</p> <p>21 other panel that you were on?</p> <p>22 A. I don't remember.</p> <p>23 Q. You don't remember. Do you</p> <p>24 remember any of the bias questions?</p> <p>25 A. No.</p> | <p>23</p> <p>1 Q. No. Do you remember how you felt</p> <p>2 while you were answering those bias</p> <p>3 questions?</p> <p>4 A. No, no feeling, just answered the</p> <p>5 questions.</p> <p>6 Q. Okay. Sometimes you can get a</p> <p>7 survey or a list of questions or have a</p> <p>8 phone call with questions in it and you can</p> <p>9 feel maybe like these questions are pretty</p> <p>10 pedestrian, they seem pretty typical; or</p> <p>11 perhaps they seem more tailored, they seem</p> <p>12 more specific. Do you recall having any</p> <p>13 impressions of any kind when you heard</p> <p>14 them?</p> <p>15 A. Yeah, no impression either way.</p> <p>16 Q. No impression. Excellent. What</p> <p>17 was your role in the disciplinary</p> <p>18 proceedings?</p> <p>19 A. Hearing Officer.</p> <p>20 Q. Hearing Officer. How would you</p> <p>21 describe the role of a Hearing Officer?</p> <p>22 How would you describe the role?</p> <p>23 A. Listen to both sides during the</p> <p>24 hearing process. Ask questions or</p> <p>25 clarifications.</p> |

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| <p>1 Q. When you were on the -- when you 2 got the role -- not when you got the role. 3 As, in your role as a Hearing Officer, was 4 there ever a time when someone kind of 5 described to you what you were -- was there 6 ever a time when someone described to you 7 what you should be doing as a Hearing 8 Officer?</p> <p>9 MR. BILUS: Object to form.</p> <p>10 A. No.</p> <p>11 MR. BILUS: Sorry. I just, 12 Mary, did you hear my objection?</p> <p>13 THE COURT REPORTER: Yes.</p> <p>14 MR. BILUS: Thank you.</p> <p>15 Q. Got it. And thank you both for 16 that. You were never told -- could you 17 describe the expectations that, the 18 expectations for Hearing Officers?</p> <p>19 A. To fairly listen to both sides.</p> <p>20 Q. You said you would ask questions, 21 clarifying questions. Were you also or at 22 any point did those questions diverge into 23 more perhaps investigative?</p> <p>24 A. In this particular hearing, I don't 25 recall asking any questions.</p> | <p>25</p> <p>1 Q. Okay. Why didn't you ask any 2 questions?</p> <p>3 A. I didn't -- I didn't have any 4 questions based on information that had 5 been shared.</p> <p>6 Q. Okay, makes sense, makes sense. 7 You felt like both sides then pretty 8 adequately presented their arguments?</p> <p>9 MR. BILUS: Objection to form.</p> <p>10 A. Correct.</p> <p>11 Q. Did you believe that both sides 12 were adequately -- did you believe both 13 sides, excuse me, adequately fleshed out 14 their arguments?</p> <p>15 MR. BILUS: Object to the form. 16 You can answer.</p> <p>17 A. I believe they presented the 18 information that both sides had.</p> <p>19 MX. WORLDS: Good objection, 20 Sandy, thank you. I'm learning.</p> <p>21 Q. (BY MX. WORLDS) All right. Have 22 you had any interactions with SJP since the 23 February 4 disciplinary hearing?</p> <p>24 A. Can you define interaction?</p> <p>25 Q. Yes, I can.</p> |
| <p>1 A. Thank you.</p> <p>2 Q. Have you yourself had any -- have 3 you yourself communicated with them, as 4 opposed to them communicating with you or 5 you reading about something in the news, 6 but have you either in written, verbal, 7 through carrier pigeon, communicated with 8 the officers of SJP?</p> <p>9 A. No.</p> <p>10 Q. Before the hearing, how did you 11 prepare for your role?</p> <p>12 A. I didn't do anything.</p> <p>13 Q. Yeah. I was pretty sure, I was 14 pretty sure that was the answer. Earlier 15 you said you don't recall much from the 16 first disciplinary panel you sat on; is 17 that correct?</p> <p>18 A. Correct.</p> <p>19 Q. Though you don't recall much, do 20 you recall there being any major 21 differences in the way the processes worked 22 between that first panel and then the SJP 23 panel?</p> <p>24 A. No.</p> <p>25 Q. No. Do you recall anything unusual</p> | <p>27</p> <p>28</p> <p>1 happening during the SJP procedures? 2 Proceedings, excuse me?</p> <p>3 A. No.</p> <p>4 Q. Anything inappropriate?</p> <p>5 A. Can you define inappropriate?</p> <p>6 Q. How would you define inappropriate?</p> <p>7 A. Nothing out of the ordinary that I 8 can recall, Solomon.</p> <p>9 Q. I'm asking you of course because 10 it's, to me, it's really about your 11 impression.</p> <p>12 A. Sure.</p> <p>13 Q. I think inappropriate, much like 14 beauty, is in the eye of the beholder. So 15 did you recall, did you think that anyone 16 was unfair about how the process went 17 about?</p> <p>18 A. No.</p> <p>19 Q. How long would you say that 20 February 4 hearing was?</p> <p>21 A. Long. I don't recall a definitive 22 timeline, Solomon, without looking back at 23 my calendar.</p> <p>24 Q. Makes sense. It feels like 25 whenever you're in those kinds of</p> |

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8 (Pages 29 to 32)

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| <p>1 disciplinary proceedings, it just becomes a 2 void. Any, did you receive any specific 3 instructions as to what to do, rather, how 4 to, how to weigh the evidence?</p> <p>5 A. Not that I remember.</p> <p>6 Q. And I believe you already answered 7 this, but any specific trainings for this 8 panel?</p> <p>9 A. No.</p> <p>10 Q. Okay, Kirsten, could you please 11 open up the document that we'll now mark as 12 Tuscano 2.</p> <p>13 Sandy, it's 14054 through -57. I believe 14 this is the document you sent us last 15 night; is that correct, Sandy?</p> <p>16 MR. BILUS: I'll have to look at 17 it once it comes up on the screen.</p> <p>18 Q. I think it's, yeah, well, once it 19 comes up on screen, we'll talk about it.</p> <p>20 MR. BILUS: Looks like it.</p> <p>21 Q. Yeah. Jen, can you see this 22 document?</p> <p>23 A. I can.</p> <p>24 Q. And do you recognize it?</p> <p>25 A. Yes.</p> | <p>29</p> <p>1 Q. Excellent. What is this document?</p> <p>2 A. Those are my notes from the Conduct <p>3 Hearing.</p> <p>4 Q. And this document, you said they're 5 your notes, so you drafted them?</p> <p>6 A. Correct.</p> <p>7 Q. When did you draft them?</p> <p>8 A. During the Conduct Hearing.</p> <p>9 Q. Okay. The handwritten portion at 10 the top right, did you also draft that?</p> <p>11 A. I did, yes.</p> <p>12 Q. Do you believe these notes are 13 accurate?</p> <p>14 A. Yes.</p> <p>15 MR. BILUS: Objection to form.</p> <p>16 Q. When did you write the handwritten 17 portion of it in the top right?</p> <p>18 A. I don't remember.</p> <p>19 Q. Do you believe it would have been 20 the same day?</p> <p>21 A. Yes.</p> <p>22 Q. Would you like to -- actually I'd 23 like to give you an opportunity to read 24 through this document and then I actually 25 have some questions about the document.</p> </p> |
| <p>1 Would you like us to zoom in on it so you 2 can read it better?</p> <p>3 A. Please.</p> <p>4 Q. Excellent. Kirsten, could you 5 please?</p> <p>6 Jen, feel free to ask Kirsten to scroll as 7 you're ready.</p> <p>8 A. Okay. Kirsten, you can scroll on 9 that, "Can you explain the cadence."</p> <p>10 Kirsten, you can scroll again, please. You 11 can scroll again, please, Kirsten. I'm 12 ready, Kirsten, to scroll again. You can 13 scroll again.</p> <p>14 Good. Complete.</p> <p>15 Q. Thank you. Sorry to do this, but, 16 Kirsten, could you please bring up unmarked 17 Exhibits, Conduct Board Recommendation 18 Form.</p> <p>19 Sandy, I believe you should also have 20 access to that in the Dropbox.</p> <p>21 And, Mary, I believe this should be 22 Tuscano 3 once we complete and mark things.</p> <p>23 Thank you.</p> <p>24 I'm going to bounce back and forth between 25 both of these documents and ask you</p> | <p>31</p> <p>32</p> <p>1 questions. So this document is a little bit 2 longer, sorry. If you could also read this 3 one over, that would be great. Thank you.</p> <p>4 A. You can scroll, Kirsten. You can 5 scroll. You can scroll. You can scroll 6 for me. You can scroll. You can scroll. 7 You can scroll, Kirsten. You can scroll.</p> <p>8 I've completed reading this page, too, 9 Solomon.</p> <p>10 Q. Thank you, Jen.</p> <p>11 A. Yep.</p> <p>12 Q. Let's go back to your notes.</p> <p>13 A. Okay.</p> <p>14 Q. Which, Mary, I'm not sure if I 15 asked to mark this as Tuscano 2, but just 16 in case I hadn't.</p> <p>17 The handwritten portion on the first page 18 in the top right, towards the bottom of 19 that handwritten portion I read something 20 that says, "Why is there a conduct 21 violation." Do you see that?</p> <p>22 Kirsten, could you highlight that?</p> <p>23 A. Yeah, oh, yep, gotcha.</p> <p>24 Q. What did you mean when you wrote 25 that?</p> |

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| <p style="text-align: right;">33</p> <p>1 A. That I didn't believe that the 2 complainant provided sufficient evidence or 3 information for me to determine whether a 4 conduct violation actually occurred.</p> <p>5 Q. Who --</p> <p>6 A. I'm sorry, say it again?</p> <p>7 Q. I'm sorry, I think when I moved my 8 papers it might have clogged my mic. I 9 asked, who is the complainant?</p> <p>10 A. David and DaVaughn.</p> <p>11 Q. David Day? David's last name I 12 believe is Day; correct, D-A-Y?</p> <p>13 A. I believe so.</p> <p>14 Q. I believe we're talking about the 15 same person, I just want to make sure. 16 Give me one moment, please.</p> <p>17 I believe we are talking about the same 18 person, but for now we'll just keep 19 referring to this individual as David.</p> <p>20 A. Okay.</p> <p>21 Q. David and DaVaughn were the 22 complainants, and were they representing 23 themselves as the complainants, they as 24 individuals were complainants or --</p> <p>25 A. I don't know.</p> | <p style="text-align: right;">34</p> <p>1 Q. So it's unclear as to whether or 2 not David and DaVaughn were in fact 3 representing an office or the University or 4 themselves?</p> <p>5 A. No, it was clear they were 6 representative of the offices outlined in 7 the other document. Sorry, I don't know the 8 -- how you're phrasing them or categorizing 9 them, but the second document that you 10 asked me to read, they were representing 11 those two offices.</p> <p>12 Q. Kirsten, could you please move to 13 the Conduct Recommendation, or the Conduct 14 Board Recommendation. Thank you. Could 15 you scroll to the top, please.</p> <p>16 Now, you said that it was clear that they 17 were representing which office now?</p> <p>18 A. Student Involvement and Student 19 Organizations and Advising.</p> <p>20 Q. I'm reading this testimony that was 21 just highlighted that's on this, that's on 22 Tuscano 3, is what we're calling it, the 23 Recommendation Form, and I believe I see it 24 says the complainant in this case is 25 University of Pittsburgh. Do you think</p> |
| <p style="text-align: right;">35</p> <p>1 it's possible that David Day and DaVaughn 2 were representing the University of 3 Pittsburgh in this matter?</p> <p>4 MR. BILUS: Objection to the 5 form.</p> <p>6 Q. You can still answer.</p> <p>7 A. I'm sorry, Solomon?</p> <p>8 Q. I said you can still answer.</p> <p>9 A. Yes.</p> <p>10 Q. Thank you. Let's go back to the 11 prior document,</p> <p>12 Kirsten. Thank you. Okay, so as you said 13 earlier, you wrote,</p> <p>14 "Why is there a conduct violation" on your 15 notes, you hand-wrote that because you 16 didn't think that the complainant, the 17 University of Pittsburgh, had presented 18 sufficient information to prosecute its 19 case basically?</p> <p>20 A. Correct.</p> <p>21 MR. BILUS: Object to the form.</p> <p>22 Go ahead.</p> <p>23 A. Yes.</p> <p>24 Q. Thank you. What information did 25 DaVaughn and David Day present?</p> | <p style="text-align: right;">36</p> <p>1 A. Can you clarify?</p> <p>2 Q. Yes. In what ways did you believe 3 that the information was -- strike that. 4 We'll move on.</p> <p>5 In the presentations between SJP and the 6 University of Pittsburgh during the 7 February 4 hearing, were there important 8 factual differences?</p> <p>9 MR. BILUS: Object to form.</p> <p>10 MX. WORLDSD: Could you specify, 11 Sandy?</p> <p>12 MR. BILUS: Sorry?</p> <p>13 MX. WORLDSD: Will you specify?</p> <p>14 MR. BILUS: Vague. Ambiguous.</p> <p>15 Q. (BY MX. WORLDSD) When the 16 University of Pittsburgh presented its 17 recitation of the facts -- excuse me. 18 During the February 4 hearing, did the 19 University of Pittsburgh present factual 20 evidence? Did it present its side of the 21 story?</p> <p>22 A. Yes.</p> <p>23 Q. Did SJP present its side of the 24 story?</p> <p>25 A. Yes.</p> |

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10 (Pages 37 to 40)

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| <p>1 Q. Were there differences between both 2 sides of the story? 3 A. Yes. 4 Q. What were those differences? 5 A. The event or lack thereof event and 6 the perception based on both sides, how 7 they viewed it. 8 Q. It's my understanding from your 9 notes that there wasn't clarity as to what 10 an event was; is that correct? 11 A. Correct. 12 MR. BILUS: Objection to form. 13 Go ahead. 14 Q. Is that correct? 15 A. Yes. 16 Q. Per your reading of your notes? 17 A. Yes. 18 Q. And is that what you recall from 19 your own recollection? 20 A. That is what I recall. 21 Q. Did SJP present arguments during 22 the hearing? Did it argue on its own behalf 23 that it didn't -- you know, anything, did 24 it argue on its own behalf with regard to 25 its own side of the story?</p> | <p>37</p> <p>1 A. Yes. 2 Q. Yes. Did it argue why it should 3 not be found responsible for the charges 4 against it? 5 A. Yes. 6 Q. Do you remember those arguments? 7 A. They believed that what occurred in 8 the library was not defined as an event or 9 that it violated library policy. 10 Q. Did SJP mention that they felt 11 targeted by Pitt? 12 A. Yes. 13 Q. Did they say that they felt 14 targeted based on their political views? 15 A. I don't remember. 16 Q. Did SJP ever mention an 17 organization called Betar USA? 18 A. I don't remember. 19 Q. Do you remember SJP bringing up 20 anything about a bomb threat against the 21 organization? 22 A. I don't remember. 23 Q. Okay. Did SJP argue that Pitt was 24 overly surveilling them? 25 A. Yes.</p> |
| <p>1 Q. Did SJP argue that the policies 2 were perhaps inconsistent as applied to 3 them? 4 A. Yes. 5 Q. Did SJP argue that the policies 6 were vague or perhaps hard to understand? 7 A. I don't remember. 8 Q. Did SJP argue that the hearing and 9 charges set a dangerous precedent for free 10 speech? 11 A. Yes. 12 Q. Did SJP ask you to find them not 13 responsible for the charges? 14 A. Yes. 15 Q. Did they ask you to dismiss the 16 charges? 17 A. I don't remember. 18 Q. Were there any instructions to SJP 19 after the hearing from the University? Do 20 you recall any instructions to SJP after 21 the hearing? 22 A. I don't recall. 23 Q. You don't recall. I suppose I know 24 the answer here. I initially asked from 25 Pitt, but did the panel give them any</p> | <p>39</p> <p>1 specific instructions? 2 A. No. 3 Q. Do you recall -- I guess this, I 4 also know the answer to this -- do you 5 recall whether anyone specifically 6 communicated to SJP that they were not to 7 communicate with the panel? 8 A. I don't know. 9 Q. You don't -- I'm going to re-ask 10 that question. I'm going to see if I can -- 11 did anyone -- excuse me. You don't recall 12 or are you -- you don't recall whether 13 someone gave SJP that instruction, or are 14 you saying no one gave SJP that 15 instruction? 16 A. I -- 17 MR. BILUS: Objection to the form. 18 Go ahead. 19 A. I don't know. 20 Q. Remember? 21 MR. BILUS: Objection to form. 22 THE COURT REPORTER: Excuse me, 23 I'm not sure I heard that question. I just 24 heard, "Remember." 25 MX. WORLDS: I asked, "You don't</p> |

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11 (Pages 41 to 44)

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| <p>1 remember?" But I will ask again. 2 THE COURT REPORTER: And then 3 there was an objection. Okay, thank you. 4 Q. (BY MX. WORLDS) Was SJP instructed 5 not to communicate with panelists? 6 A. I don't know. 7 Q. You don't know. Thank you. Sorry 8 for that confusion. Did the panelists 9 receive any instructions from the 10 University after the hearing? 11 A. Can you clarify? 12 Q. Did you ask me to clarify or did 13 you say did you? 14 A. Yeah, can you clarify or be -- 15 Q. Yes. I may not be able to. Did 16 the University give you any instructions at 17 all after the -- after the hearing, with 18 regards to the hearing? 19 A. Only as it relates to next steps 20 for our deliberations and completion of the 21 form that you've shared on the screen. 22 Q. And what were the next steps that 23 they talked about? 24 A. Panel was to meet, discuss the 25 hearing, and make -- and complete the form.</p> | <p>41</p> <p>1 Q. Did the panel ever get a chance to 2 meet? 3 A. Yes. 4 Q. When did the panel meet? 5 A. Immediately following the hearing. 6 Q. Like ten minutes following the 7 hearing or -- 8 A. Immediately following the hearing. 9 Q. Less than ten minutes following? 10 Okay. 11 A. Yeah, from what I can remember. 12 Q. Okay. What was that meeting like? 13 A. The panelists discussed the 14 hearing. 15 Q. Was there consensus early on? 16 MR. BILUS: Objection to the 17 form. 18 Q. Did the panel, did the panelists 19 ever reach consensus as to rationale or 20 conclusion? 21 A. I don't believe we reached full 22 consensus. 23 Q. It sounds like you believe there 24 may have been a partial consensus? 25 A. I don't believe we completed our</p> |
| <p>1 process before being notified to end our 2 process with the hearing. 3 Q. During the discussions immediately 4 following that February 4 hearing, what was 5 your impression of the hearing? 6 A. Can you repeat that first part, 7 Solomon? 8 Q. During that immediate conversation 9 following the hearing, what was your 10 impression of the hearing? How did you 11 express your thoughts about SJP's 12 disciplinary hearing? 13 A. My initial thoughts were that the 14 complainants did not adequately provide 15 information or evidence related to a 16 library policy violation. 17 Q. Had you been the only panelist, you 18 were the czar of the panel, you could have 19 decided right then and there in that 20 immediate moment, would you have found SJP 21 responsible? 22 MR. BILUS: Object to the form. 23 Q. Please answer the question. 24 A. Can you repeat it for me, Solomon? 25 Q. In the immediate aftermath, had you</p> | <p>43</p> <p>1 been the sole panelist, would you have -- 2 how would you have found for SJP, 3 responsible or not responsible, with 4 regards to the allegations? 5 MR. BILUS: Object to the form. 6 Q. Please answer. 7 A. I can still answer? 8 Q. Yes. 9 A. I wouldn't -- I wouldn't say in the 10 immediate, Solomon, without reviewing my 11 notes post. But if I were the only 12 panelist, I do believe I would have found 13 SJP not responsible for a policy violation. 14 Q. Kirsten, could we look at the 15 recommendation form. 16 Jen, do you recognize this document? 17 A. Yes. 18 Q. Kirsten, could you quickly, not too 19 quickly, but with some pace scroll through 20 this document again just to show Jen that 21 this is the document she read not too long 22 ago. 23 And I'm sorry, Jen, I don't know that I 24 caught your pronouns at the beginning of 25 this. Do you use she/her pronouns?</p> |

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12 (Pages 45 to 48)

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| <p>45</p> <p>1 A. I do. 2 Q. Excellent, thank you. Just, you 3 understand this is the document you read 4 not too long ago, Jen?</p> <p>5 A. Yes. 6 Q. Excellent, thank you. 7 Kirsten, you can go back to the top of 8 the 9 document. You said you recognize this 10 document?</p> <p>11 A. Yes. 12 Q. What is this document?</p> <p>13 A. A Conduct Board Recommendation 14 Form. 15 Q. When's the first time you saw this 16 document? Do you recall seeing this 17 document before today?</p> <p>18 A. I do. 19 Q. Do you remember when that was?</p> <p>20 A. On a Zoom with the other panelists. 21 Q. Do you know who made this document?</p> <p>22 A. One of the other panelists. 23 Q. Do you recall which one?</p> <p>24 A. Zach Davis. 25 Q. Zach Davis. Is Zach Davis -- do</p> | <p>1 you know who the author is of this, of the 2 -- not the form aspect of the form, but the 3 entry, the entries as it were, do you know 4 who authored that?</p> <p>5 A. Do you mean the content? 6 Q. That's the word I'm looking for. 7 Thank you.</p> <p>8 A. Zach Davis. 9 Q. Zach. Did Zach get your input 10 while authoring this?</p> <p>11 A. Yes. 12 Q. How many panelists were there 13 during the February 4 hearing?</p> <p>14 A. Three including myself. 15 Q. So it was you, Zach, and then who 16 was the third?</p> <p>17 A. Carlton Scott. 18 Q. Carlton Scott. Two first names. 19 Did Carlton also have a hand in drafting 20 this?</p> <p>21 A. Yes. 22 Q. This document seems to be, seems to 23 be pretty far along in the drafting 24 process. Where would you say this document 25 is in the drafting process?</p> |
| <p>47</p> <p>1 MR. BILUS: Object to the form. 2 Q. Could you say? Could you say where 3 this document is in the drafting process?</p> <p>4 A. Pretty far along. 5 Q. That's a good answer. Okay, so 6 just to recap, Zach was the one who was 7 actually typing into the document; correct?</p> <p>8 A. That is correct. 9 Q. As he was typing into the document, 10 though, you and Carlton were weighing in; 11 is that correct?</p> <p>12 A. That is correct. 13 Q. During that drafting process, was 14 it difficult to come to final language? 15 Well, was it difficult to come to the 16 language that ultimately we're reading 17 today?</p> <p>18 MR. BILUS: Object to the form. 19 A. No. 20 Q. Sandy said, "Object to the form," 21 but, Jen, you just said, "No"; is that 22 correct?</p> <p>23 A. Correct. 24 Q. Thank you. Did the group discuss a 25 recommended outcome?</p> | <p>48</p> <p>1 A. Yes. 2 Q. And all of this, the conversation, 3 the drafting, and the discussion of the 4 recommended outcome, that was all in the 5 immediate Zoom call after the February 4 6 hearing? Or excuse me. Was that all in 7 the immediate call after the February 4 8 hearing?</p> <p>9 A. Yes. 10 Q. You said you discussed a 11 recommended outcome. What was that 12 discussion like?</p> <p>13 A. Discussion revolved around whether 14 there was an actual library policy 15 violation. We discussed. 16 Q. And --</p> <p>17 A. But did not finalize or generate a 18 recommendation from the panel. We didn't 19 get to a conclusion from the panel. 20 Q. You didn't get to a conclusion from 21 the panel. What was your view during that 22 discussion? Excuse me. What was your view 23 during that discussion?</p> <p>24 A. Can you clarify? 25 Q. What was your view during that</p> |

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13 (Pages 49 to 52)

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| <p style="text-align: right;">49</p> <p>1 discussion with regards to the outcome? 2 A. That it was unclear whether there 3 was a violation, policy violation or not. 4 Q. What was Zach's view during the 5 discussion with regards to the outcome? 6 A. I don't remember. You'd have to 7 ask him. 8 Q. Carlton's view? 9 A. I don't remember. 10 Q. Thank you. Did you share these 11 findings with anyone? 12 A. No. 13 Q. I'm going to re-ask that question. 14 I think I'll get the same answer. Did you 15 share these findings with anyone in Pitt's 16 upper administration? 17 A. I did not. 18 Q. Anyone in Student Conduct? 19 A. Did I share them with anyone? 20 Q. Did you, yes, yes, ma'am. 21 A. I did not. 22 Q. Are you aware of whether Zach or 23 Scott, excuse me, Zach or Carlton -- two 24 first names -- whether Zach or Carlton 25 shared them with anyone in Pitt's upper</p> | <p style="text-align: right;">50</p> <p>1 administration or anyone in Student 2 Conduct? 3 A. Shared, can you clarify? Did 4 either of those two share this form; is 5 that what you're asking me? 6 Q. Yes, ma'am, that's what I'm asking. 7 A. I don't know. 8 Q. Thank you. Was that the only -- 9 excuse me. Immediately after the February 4 10 panel, you and the other two panelists got 11 together to deliberate and created the 12 draft of the recommendation form that I see 13 before me, before us all; is that correct? 14 A. Yes. 15 Q. Did you get the occasion to meet 16 any other times? 17 A. Yes. 18 Q. When was the next time you all met? 19 A. I don't remember. 20 Q. Kirsten, I'm sorry to do this to 21 you because it's going to be a little out 22 of order, but could you please bring up 23 what was previously I believe marked as 6 24 but we'll now mark as 5. 25 And, Mary, could we please mark this next</p> |
| <p style="text-align: right;">51</p> <p>1 document as Tuscano 5. Sandy, it's UPITT 2 14030 to 31. 3 MR. BILUS: I think we skipped a 4 4. (The court reporter asked for 5 clarification.) 6 MX. WORLDS: Yes, this is the 7 correct document, Kirsten. Thank you. 8 MR. BILUS: So we're going to 9 mark Bates No. 14030 as Exhibit 4? 10 MX. WORLDS: Yes, that is 11 correct. Thank you. Sorry, everybody, 12 about the confusion. 13 Q. (BY MX. WORLDS) Kirsten, could you 14 scroll down to the bottom. Because it's an 15 email, it makes sense to read it from 16 bottom to top. 17 And, Jen, if you could just read over 18 this. 19 A. Okay, I've read it. 20 Q. Okay, thank you. 21 A. You can scroll. 22 Q. Excellent. Jen, is this document 23 -- do you know what this document is? 24 A. Yes. 25 Q. What is it?</p> | <p style="text-align: right;">52</p> <p>1 A. An email exchange between Marlin 2 and the panel with Matt Landy copied. 3 Q. It looks like Marlin's email is 4 dated February 6 to everybody; is that 5 correct? 6 A. Can you scroll down? Correct. 7 Q. Excellent. So Dean Nabors sent the 8 email to you on, sent this email to you on 9 February 6 then. This email is asking the 10 panel to pause its deliberation? 11 Kirsten, could you please highlight that? 12 It's near the middle of what Nabors had 13 said. 14 Asks that you pause any ongoing 15 deliberations or preparations of any 16 written record of findings; is that 17 correct? 18 A. Correct. 19 Q. Okay. I'm showing you this email 20 because you said you weren't sure when you 21 would have met with the rest of the panel. 22 We know that the hearing was on the 4th. 23 We know that Nabors sent you and the rest 24 of the panel this email on the 6th, which 25 means that you likely met on the 5th; would</p> |

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14 (Pages 53 to 56)

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| <p style="text-align: right;">53</p> <p>1 you say that that's probable? 2 A. Yes. 3 Q. Excellent. Do you recall what a 4 meeting on the 5th would have been about? 5 Excuse me. Please let me rephrase that 6 question. Do you recall any specifics 7 about what a meeting on February 5 with the 8 panelists, what the contents of that 9 meeting would have been, what you would 10 have discussed with them? 11 A. Yes. 12 Q. Will you please describe it? 13 A. Continued work on the conduct form draft. 14 Q. So the document that we marked as 15 3, the recommendation form, that is the 16 work of you, Zach, and Carlton in your 17 meetings immediately after the February 4 18 panel and then on a meeting that took place 19 on February 5; is that correct? 20 A. Yes. 21 Q. Excellent, thank you. And thank 22 you for going along with me with that 23 email. 24 Kirsten, could you please present the Open</p> | <p style="text-align: right;">54</p> <p>1 Letter? Sandy, this is UPITT 527. And, 2 Mary, could we please mark this as 3 Tuscano 5. On the screen you'll see that 4 the title has a 4 in front of it. Please 5 disregard that 4. This is Tuscano 5. 6 Jen, have you seen this before? 7 A. Yes. 8 Q. Do you know what it is? 9 A. Yes. 10 Q. Could you tell us what it is? 11 A. A letter from SJP. 12 Q. For purposes of today's deposition, 13 do you mind if we refer to it as the Open 14 Letter? 15 A. Yes, good. 16 Q. I know that was a trick question. 17 I said do you mind. 18 A. Yeah, I was going to say, no, I don't mind. 19 Q. Okay, thank you, thank you. 20 A. Yep. 21 Q. Would you like -- actually I'll 22 give you a chance to read over it if you 23 could. For my purposes, it's not very 24 important if you read the To, From, and CC</p> |
| <p style="text-align: right;">55</p> <p>1 line. If you'd like to read them, please 2 feel free, but it's really the body of the 3 message. 4 A. You can scroll, please, Kirsten. 5 Q. And for your own awareness, we can 6 of course continue to scroll to the bottom 7 of this document, but I only intend to ask 8 you about contents on the first page. 9 A. Okay. 10 Q. You let me know when you're ready. 11 A. I'm ready, Solomon. 12 Q. Excellent, thank you. You're a 13 recipient of the Open Letter; correct? 14 A. Yes. 15 Q. What did you do when you first saw 16 it? 17 A. Read it. 18 Q. Normal response to email. How did 19 you react when you read it? 20 A. No real -- 21 Q. Did you react? Excuse me, did you 22 react? 23 A. I did not. 24 Q. Why not? 25 A. Because I believed my role on the</p> | <p style="text-align: right;">56</p> <p>1 Hearing Board was to determine whether a University library policy violation occurred. 2 Q. Did you communicate with anyone, 3 after reading the letter, about the letter? 4 In the immediate, you know -- 5 A. No. 6 Q. Okay, thank you, thank you. I'm 7 aware that there were some communications, 8 I mean, we just saw one. 9 A. Sure. 10 Q. So when you first got the letter, 11 you read it, didn't think much of it and 12 you didn't immediately reach out to someone 13 to communicate with them; is that correct? 14 A. That is -- 15 MR. BILUS: Object to the form. 16 Q. Please answer. 17 A. That is correct. 18 Q. Thank you. When was the first time 19 you spoke to someone from the University 20 about the letter? 21 A. I don't remember. 22 Q. Did you speak with the co- 23 panelists about the letter?</p> |

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15 (Pages 57 to 60)

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| <p>1 Jen, before you answer that question, 2 Kirsten, could you please pull up document 3 No. 6, which will remain document No. 6. 4 For you, Sandy, once I find it, it is 5 UPITT 2439. 6 And, Mary, could we please mark this as 7 Tuscano 6. Thank you. Jen, could you take 8 a moment and read over 9 this document, please?</p> <p>10 A. Yes. You can scroll, Kirsten, 11 please. You can scroll, please.</p> <p>12 Q. That's the document. Thank you, 13 Kirsten. 14 We'll stay on this document for now. But 15 talking about the Open Letter, did you get 16 a chance to speak with panelists about the 17 Open Letter before a University Dean or 18 someone from the administration reached out 19 to you about it?</p> <p>20 A. Yes.</p> <p>21 Q. What was that conversation like?</p> <p>22 A. Acknowledgment that we received it.</p> <p>23 Q. Acknowledged it. Was there any 24 other kind of group reaction with regards 25 to the Open Letter?</p> | <p>57</p> <p>1 A. No. 2 Q. Did the Open Letter influence at 3 all how you thought about the February 4 4 hearing?</p> <p>5 A. No. 6 Q. Do you recall whether the letter, 7 whether Zach had any sort of strong, or had 8 any reaction, excuse me, at all, to the 9 Open Letter?</p> <p>10 A. I don't recall. 11 Q. Do you recall if Carlton had any 12 reaction to the Open Letter?</p> <p>13 A. I don't recall. 14 Q. You just read over Tuscano 6. Am I 15 saying your last name correctly, Tuscano?</p> <p>16 A. Tuscano, "can" instead of "cahn". 17 Q. Thank you. It's not fun to hear 18 your name mispronounced the entire way, the 19 entire time. Tuscano, thank you. Tuscano 6 20 -- I'm working on it -- you just read over 21 it. Have you seen this document before?</p> <p>22 A. No. 23 Q. No. Do you know what it is, 24 though, from reading it?</p> <p>25 A. From the parts where it has my name</p> |
| <p>1 indicated, I recall those questions being 2 asked of me in a phone call by Marlin 3 Nabors.</p> <p>4 Q. Okay. These are notes from Marlin 5 Nabors in conversations that he had with 6 you and conversations that he had with Zach 7 and Carlton. The portions that are of 8 course yours, are they correct and accurate 9 to the best of your recollection?</p> <p>10 A. Yes, to the best of my 11 recollection.</p> <p>12 MR. BILUS: Object to the form. 13 Go ahead.</p> <p>14 A. Yes.</p> <p>15 Q. From what you've read, is the 16 content, does the content reflect the 17 conversations you had with Zach?</p> <p>18 A. Yes.</p> <p>19 Q. Does the content reflect what the 20 conversations you had with Carlton?</p> <p>21 A. Yes.</p> <p>22 Q. Excellent.</p> <p>23 Kirsten, could you please go back to 24 the 25 Open Letter. Kirsten, I'm sorry, let's go</p> | <p>59</p> <p>1 back to the document we were on. Okay, 2 appreciate it. Let's scroll to the top.</p> <p>3 In this document we see that Carlton 4 in 5 particular was concerned with threatening 6 language that was used during the February 7 4 panel. Do you see instances of that in 8 this document? If you'd like I can --</p> <p>9 MR. BILUS: Object to the form. 10 I'm sorry, I didn't mean to cut you off, 11 Solomon. Go ahead.</p> <p>12 Q. That's okay. If you'd like, I can 13 direct you to a few places, if that would 14 be helpful?</p> <p>15 A. Please, yes, please.</p> <p>16 Q. Kirsten, on Page 1, if you go to 17 Carlton.</p> <p>18 So the second question, "Did you talk 19 about the email during deliberations?" 20 Carlton's answer, the one, two, third line, 21 it says, "The other board members didn't 22 understand it in the same way I did. My 23 concern was there should be something where 24 they shouldn't be able to do that - speak 25 to Hearing Board members in that capacity.</p> |

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16 (Pages 61 to 64)

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| <p>1 Similar to saying to jurors that 'watch 2 what you decide' because I have all these 3 people behind me. You should be aware. We 4 didn't need to be on that email."</p> <p>5 Carlton's, is it fair to say Carlton's 6 concerned here; right? He literally used 7 the words, "My concern"?</p> <p>8 A. Yes.</p> <p>9 Q. He references language used when 10 they, which I assume is SJP, spoke to the 11 Hearing Board members. Would you agree 12 with that assessment? Would you like me to 13 resay that?</p> <p>14 A. Yeah.</p> <p>15 Q. That's okay. Carlton is 16 referencing SJP's words to the panelists; 17 is that correct?</p> <p>18 MR. BILUS: Are you -- are you 19 just -- I mean, she's never seen this 20 document before and wasn't on the phone 21 call that this was, these are notes about. 22 Are you just asking her to read it and give 23 you her interpretation?</p> <p>24 MX. WORLDS: No, I'm not just 25 asking her to read it and give her</p> | <p>61</p> <p>1 interpretation. I'm -- my plan is to ask if 2 this comports with some of the 3 conversations that she had with Carlton. I 4 know that we've gotten a yes on that 5 already, but I want to get into the details 6 because I think the details are important. 7 MR. BILUS: What was your 8 question again?</p> <p>9 Q. (BY MX. WORLDS) According to 10 Carlton here per Nabors' notes, he had 11 concern with some of the language that SJP 12 used during the February 4 hearing. Is 13 that your understanding from the 14 highlighted information there, Jen?</p> <p>15 MR. BILUS: I'll object. But, 16 Jen, go ahead and answer if you can.</p> <p>17 A. Yes.</p> <p>18 Q. Do you recall conversations with 19 Carlton where he discussed issues that he 20 had with SJP's words and rhetoric during 21 the February 4 hearing?</p> <p>22 A. Yes.</p> <p>23 Q. Do you recall what comments 24 specifically he took issue with?</p> <p>25 A. I don't recall.</p> |
| <p>1 Q. Later on in the next paragraph, the 2 question posed is, "Did you talk about the 3 fact that it could influence the board 4 during deliberations?" Zach's response is, 5 "No. Their comments during the hearing was 6 more problematic." Do you recall Zach 7 expressing issue or concern with comments 8 SJP representatives made during the 9 February 4 hearing?</p> <p>10 A. No, I don't recall.</p> <p>11 Q. Now I'm ready to go back to the 12 Open Letter, Kirsten, thank you. 13 You read over the Open Letter today. In 14 doing so, was there anything that stood out 15 to you?</p> <p>16 A. No.</p> <p>17 Q. And if I recall correctly, nothing 18 stood out to you when you first received 19 the letter; is that correct?</p> <p>20 A. That is correct.</p> <p>21 Q. We earlier referenced a pause in 22 adjudication, or rather, excuse me, in 23 deliberation, and I believe we looked at an 24 email from Nabors asking the panelists to 25 pause; is that correct?</p> | <p>63</p> <p>1 A. That's correct.</p> <p>2 Q. From your understanding, why was 3 the panelists, why was the panel, excuse 4 me, asked to pause deliberations?</p> <p>5 A. From my understanding, it was due 6 to the Open Letter sent to the panelists.</p> <p>7 Q. Okay. Kirsten, you can stop 8 sharing your screen now. Thanks.</p> <p>9 MR. BILUS: Solomon, at this 10 point we've been going for an hour and a 11 half. Do you have a lot left, or should we 12 take a break?</p> <p>13 MX. WORLDS: You know what, this 14 is actually a perfect time for a pause. 15 Let's take maybe ten minutes, come back at, 16 eleven minutes, come back at 1:45?</p> <p>17 MR. BILUS: Sounds great.</p> <p>18 MX. WORLDS: Thanks, everyone.</p> <p>19 THE WITNESS: Thank you. (A 20 recess was taken 1:36 to 1:48 p.m.)</p> <p>21 Q. (BY MX. WORLDS) All right, now 22 we're back from the break. I think we're 23 probably into our final descent. So let's 24 kind of do some timeline, just let's go 25 over the timeline for a second, please.</p> |

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17 (Pages 65 to 68)

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| <p>1 The hearing, SJP's hearing was on February 2 4, the one that you were a panelist on; 3 correct, Jen?</p> <p>4 A. Yes.</p> <p>5 Q. And it's your opinion that the 6 University of Pittsburgh was unable to 7 sustain its burden at that -- sustain its 8 burden to show that SJP was responsible for 9 the conduct violations for which they were 10 alleged to have committed?</p> <p>11 MR. BILUS: Object to the form.</p> <p>12 Q. Please answer.</p> <p>13 A. Yes.</p> <p>14 Q. Okay, thank you. And you got the 15 Open Letter that evening on February 4; is 16 that correct?</p> <p>17 A. Yes.</p> <p>18 Q. When did you read the letter?</p> <p>19 A. When I received it.</p> <p>20 Q. Did you read it that night then, 21 the night of February 4?</p> <p>22 A. I don't remember.</p> <p>23 Q. If you didn't read it the 4th, 24 would you have read it on February 5th?</p> <p>25 A. Yes.</p> | <p>65</p> <p>1 Q. Excellent. And the letter had no 2 bearing on your thoughts as to the February 3 4 panel; is that correct?</p> <p>4 MR. BILUS: Object to the form.</p> <p>5 A. That is correct.</p> <p>6 Q. You stated earlier that it hadn't 7 -- that it didn't change your views on the 8 February 4 panel; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Do you recall it changing the views 11 of either of the other panelists, Carlton 12 or Zach?</p> <p>13 A. No.</p> <p>14 Q. Right after the February 4 panel 15 proceedings, you and the other panelists 16 you said met together to begin writing in 17 the recommendation form document that we 18 saw earlier; is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. Was that meeting over Zoom?</p> <p>21 A. Yes.</p> <p>22 Q. And were all three of you writing 23 in the document at the same time?</p> <p>24 A. No.</p> <p>25 Q. Was the document, it was over Zoom,</p> |
| <p>1 so was the document maybe shown via screen 2 share or something like that?</p> <p>3 A. Yes.</p> <p>4 Q. And if I recall correctly, you said 5 Zach was the author, so Zach was the one 6 actually typing into the document?</p> <p>7 A. Yes.</p> <p>8 Q. While Zach was typing into the 9 document, were you giving input?</p> <p>10 A. Yes.</p> <p>11 Q. As was Carlton?</p> <p>12 A. Yes.</p> <p>13 Q. Where was that document saved? Excuse me, do you know where that document 14 was saved?</p> <p>15 A. No.</p> <p>16 Q. Do you know if it lived on -- I 17 guess you just said no, so you don't know 18 if it lived on Zach's computer or perhaps 19 in whatever cloud system Pitt uses?</p> <p>20 A. I don't know.</p> <p>21 Q. And by cloud, I mean of course 22 being a drive or something like that. 23 You're not aware of it being on any --</p> <p>24 A. I am not aware, no.</p> | <p>67</p> <p>1 Q. Okay. Did you ever have access to 2 that document?</p> <p>3 A. I believe I would have had access 4 while it was being shared on a screen, but 5 I don't recall, Solomon.</p> <p>6 Q. Access to edit the document while 7 it was shared on the screen?</p> <p>8 A. I believe -- not actually via Zoom, 9 right, with the document pulled up. But I 10 do recall the ability, if in fact the 11 document was pulled up on my computer, that 12 I could see Zach entering information on my 13 computer.</p> <p>14 Q. That seems to suggest that the 15 document was somewhere that you could have 16 edited it then, if you could see and type?</p> <p>17 A. Perhaps. But I don't -- don't know 18 where and couldn't tell you how to access 19 it.</p> <p>20 Q. Right, right. If that's the case 21 then, and you said it wasn't through a 22 screen share, which means it was probably 23 in an application outside of Zoom that you 24 were viewing this document?</p> <p>25 A. I don't know.</p> |

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18 (Pages 69 to 72)

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| <p>1 Q. You don't know. Okay, that's fine. 2 If the document -- I'm trying to 3 understand what you mean when you say that 4 you could see him typing in, so this may 5 seem -- are you familiar with Google Docs, 6 in general?</p> <p>7 A. Vaguely, yeah.</p> <p>8 Q. Have you ever worked in a Google 9 Doc document before where you can see 10 someone else typing while you're also 11 typing?</p> <p>12 A. I have.</p> <p>13 Q. Are you familiar that Microsoft has 14 a similar system called SharePoint where 15 they have an online version of Word or 16 Excel similar to the Google Suite where you 17 can do similar things?</p> <p>18 A. Vaguely, yes.</p> <p>19 Q. All right. Do you think it's 20 possible that you would have had the 21 document open in an application like that 22 or perhaps on your browser, looking at 23 something like that?</p> <p>24 A. Yes, I do think it's possible.</p> <p>25 Q. If you're looking, if you're able</p> | <p>69</p> <p>1 to see what's being typed, and perhaps even 2 if you had the ability to comment or edit, 3 does that seem likely that it was something 4 akin to that, versus, you know, certainly 5 versus a screen share on Zoom?</p> <p>6 A. Yes.</p> <p>7 Q. On February 5, the day after the 8 SJP's proceedings, you met with the other 9 co-panelists; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. During that meeting you discussed 12 the letter, the Open Letter, excuse me; is 13 that correct?</p> <p>14 A. Yes.</p> <p>15 Q. And again, all panelists said that 16 they wouldn't -- that the Open Letter 17 didn't change the way they viewed that 18 February 4 hearing; is that correct?</p> <p>19 A. Can you repeat the question for me, Solomon?</p> <p>20 Q. Yes. Yeah, just, just confirming 21 what you said earlier, which is that 22 neither you nor Carlton nor Zach thought 23 that the Open Letter changed your views 24 with regards to the February 4 hearing?</p> |
| <p>1 MR. BILUS: Are you asking what 2 they said during the February 5 call or 3 meeting that they had or --</p> <p>4 Q. Yes.</p> <p>5 MR. BILUS: Or what they 6 thought?</p> <p>7 Q. I'm asking what they -- I'm asking 8 what they said. I think that's a little 9 bit of semantics, but I'm asking what, what 10 they represented, what they -- I assume 11 what they said was what they thought, which 12 is why I think it's a little bit of 13 semantics there, but I'll rephrase the 14 question. Did the panelists say that the 15 Open Letter, the other two panelists, did 16 they say that the Open Letter had no -- it 17 didn't change their view with regards to 18 the February 4 hearing?</p> <p>19 A. Correct, yes.</p> <p>20 Q. Okay, excellent. Did any of the 21 panelists suggest pausing deliberations 22 because of the Open Letter?</p> <p>23 A. No.</p> <p>24 Q. Do you think that the process 25 should have been paused because of the Open</p> | <p>71</p> <p>72</p> <p>1 Letter?</p> <p>2 A. No.</p> <p>3 Q. Do you recall whether Zach or 4 Carlton thought that the process should 5 have been paused because of the Open 6 Letter?</p> <p>7 A. I don't recall.</p> <p>8 Q. When Nabors emailed you on the 6th 9 asking you and Scott and Zach to pause 10 deliberations, was that the first time a 11 pause came up?</p> <p>12 A. Yes.</p> <p>13 Q. Did you work on it at all after -- 14 excuse me -- did you work on the 15 recommendations, on that recommendation 16 form at all after receiving that email from 17 Nabors?</p> <p>18 A. No.</p> <p>19 Q. So that means starting on February 20 6, you stopped working on that 21 recommendation form; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Kirsten, could you please pull up 24 the late February email. And could you 25 also tell us what Bates number that is?</p> |

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19 (Pages 73 to 76)

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| <p>1 I'm sorry, I didn't write that down. 2 MS. HANLON: Yes, it's 14034. 3 And I will share that in the Dropbox, too. 4 Q. And this will be Tuscano 7. Please scroll to the bottom of this one, too, since it's an email, please. Thank you, Kirsten. 5 This email, well, once you're done reading this, Jen, we can scroll up. 6 A. You can scroll up. You can scroll up. I've read it. 7 Q. Excellent. Does this document look familiar to you? 8 A. It does. 9 Q. Do you recognize it as an email to Dean Nabors from Zach, your co-panelist, with you and Scott cc-ed on it? 10 A. Yes. 11 Q. Excuse me, you and Carlton cc-ed on it, excuse me. The contents of this email, it seems that Zach is asking for an update with regards to the hearing panel; is that correct? 12 A. Yes. 13 Q. Did you ever get an update?</p> | <p>73</p> <p>1 A. I don't recall. 2 Q. Did you ever end up working on the recommendation form between that February 6 date and this, I believe this is February 24 when this email was sent? 3 A. No. 4 Q. And has there been any work on that document since February 24? 5 A. Not to my knowledge. 6 Q. Not to your knowledge, okay. I believe one more, maybe not one more, but I do have a few other questions. 7 Kirsten, could you please pull up Tuscano's hearing notes. I believe that's -- I'm not going to guess the number. 8 MS. HANLON: 2. 9 Q. 2, yes, thank you, Tuscano 2. On Page 3, near the middle, this is connected to Jonathan Engel's -- Kirsten, could you scroll up just a little bit, please -- just for context, this is connected to your notes on Jonathan Engel, the library faculty member, I believe your notes during his testimony. 10 I see a note you've written here towards</p> |
| <p>1 the end of this section of notes, I see the question, "Have you ever witnessed in non-reservable spaces groups in that space?" And then it seems to be an answer afterwards, it says, "Saw a sorority group advertising for a study-in." Can you see the highlighted text? 2 A. Yes. 3 Q. Could you please give us a little bit of context about what, what this means? 4 I'm not entirely -- I'm not entirely sure what this means. 5 A. Based on my notes, Solomon, the question was asked of Jonathan if he had ever witnessed, in other non-reservable spaces in the library, if he ever saw groups in that area. His response was that he saw a sorority group advertising for a study-in. 6 Q. Do you remember anything else about this question and answer? 7 A. I'm sorry, I don't. 8 Q. Okay. And is this a question that you asked or is this a question that someone else asked?</p> | <p>75</p> <p>1 A. Someone else asked. 2 Q. Do you recall who asked the question? 3 A. I don't. 4 MX. WORLDS: Those are all the questions. Thank you. 5 MR. BILUS: And I have no questions. I think we can close the deposition. 6 (Signature having not been waived, the deposition was concluded at 2:03 p.m.)</p> <p>76</p> |

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20 (Pages 77 to 79)

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1 COMMONWEALTH OF PENNSYLVANIA)
2) CERTIFICATE
3 COUNTY OF ALLEGHENY) SS:
4 I, Mary J. Carney, RMR and Notary Public in and
5 for the Commonwealth of Pennsylvania, do hereby
6 certify that the witness, JENNIFER TUSCANO, was by me
7 first duly sworn to testify to the truth; that the
8 foregoing deposition was taken at the time and place
9 stated herein; and that the said deposition was
10 recorded stenographically by me and then reduced to
11 printing under my direction, and constitutes a true
12 record of the testimony given by said witness.
13 I further certify that the inspection, reading
14 and signing of said deposition were NOT waived by
15 counsel for the respective parties and by the
16 witness.
17 I further certify that I am not a relative or
18 employee of any of the parties, or a relative or
19 employee of either counsel, and that I am in no way
20 interested directly or indirectly in this action.
21 IN WITNESS WHEREOF, I have hereunto set my hand
22 and affixed my seal of office this 8th day of July,
23 2025.
24 Notary Public
25

78

1 COMMONWEALTH OF PENNSYLVANIA) E R R A T A
2) C O U N T Y O F A L L E G H E N Y) S H E E T
3 I, JENNIFER TUSCANO, have read the foregoing
4 pages of my deposition given on July 3, 2025, and
5 wish to make the following, if any, amendments,
6 additions, deletions or corrections:
7 Pg. No. Line No. Change and reason for change:
8
9
10
11
12
13
14
15
16
17 In all other respects, the transcript is true and
18 correct.
19 _____ JENNIFER TUSCANO
20 Subscribed and sworn to before me this
21 _____ day of _____, 2025.
22
23 Notary Public
24 Reference No. MC62101
25

79

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14 RE: DEPOSITION OF JENNIFER TUSCANO
15 NOTICE OF NON-WAIVER OF SIGNATURE
16 Please have the deponent read her deposition
17 transcript. All corrections are to be noted on the
18 preceding Errata Sheet.
19 Upon completion of the above, the deponent must
20 affix her signature on the Errata Sheet, and it is to
21 then be notarized.
22 Please forward the signed original of the Errata
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24 to the Original Transcript, which is in their
25 possession. Send a copy of same to all counsel, and
also a copy to me.
Please return the completed Errata Sheet within
thirty (30) days of receipt hereof.
Mary J. Carney, RMR
Court Reporter

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